

Exhibit A

IN THE CIRCUIT COURT
FIRST JUDICIAL CIRCUIT
WILLIAMSON COUNTY, ILLINOIS

Clayton Pyle)
Plaintiff,)
vs.) Case No. 16-LM- 304
Diversified Consultants, Inc.)
Registered Agent:)
Incorp Services Inc.)
901 South 2nd Street Suite 201)
Springfield, IL 62704)
Defendant.)

FILED
AUG 12 2016

Quen E. Kochan
CLERK OF THE CIRCUIT COURT

COMPLAINT

COMES NOW Plaintiff, Clayton Pyle by and through his attorney, Bill T. Walker and for his complaint against defendant, Diversified Consultants, Inc. for violation of the Fair Debt Collection Practices Act (FDCPA) states as follows:

JURISDICTION

1. This action arises from the Defendant's violation of the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq (FDCPA).
2. Venue in this County is proper because the acts and transactions occurred here, and the Plaintiff is a resident of Carterville, Williamson County, Illinois.

PARTIES

3. The plaintiff, Clayton Pyle is a natural person who resides in Carterville, County of Williamson, State of Illinois, and is a "consumer" as that term is defined by 15 U.S.C. 1692 a(3).
4. Diversified Consultants, Inc. operates from an address of 10550 Deerwood Park Blvd Suite 309, Jacksonville, Florida 32256 and is a "debt collector" as that term is defined by 15 U.S.C. 1692 a(6) and sought to collect a consumer debt from plaintiff, Clayton Pyle.

5. The defendant is a collection agency that in the ordinary course of business regularly, on behalf of itself or others, engages in debt collection.

FACTUAL ALLEGATIONS

6. Plaintiff, Clayton Pyle incurred a financial obligation to Verizon Wireless that was a primarily personal and is therefore a "debt" as that term is defined by 15 U.S.C. 1692 a (5).

7. Sometime thereafter the alleged debt was consigned, placed or otherwise transferred to the defendant, Diversified Consultants, Inc. for collection from the Clayton Pyle.

8. On a call made on 10/7/15 by the Plaintiff's wife, Stevie Pyle, to the Defendant (DCI), the Defendant violated numerous and multiple provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692e(11).

In addition, on the same call on 10/7/15, the Defendant violated numerous and multiple provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692c (b) by disclosing that the Plaintiff, Clayton Pyle, had a debt with the Defendant (DCI).

In addition, on a letter sent to the Plaintiff, Clayton Pyle, by the Defendant (DCI) dated 8/14/15, the Defendant violated numerous and multiple provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692g (a,1) by confusing the amount of the debt.

9. Due to the illegal acts of the Defendant, Diversified Consultants, Inc. the Plaintiff, Clayton Pyle has incurred and suffered mental anguish.

10. The Plaintiff, Clayton Pyle is entitled to and hereby respectfully, DEMANDS TRIAL BY JURY.

WHEREFORE, the Plaintiff, Clayton Pyle, prays that judgment be entered against the defendant, Diversified Consultants, Inc. as follows:

- a) For an award of actual damages pursuant to 15 U.S.C. 1692 (a) (1);
- b) For an award of statutory damages in an amount of \$1,000.00 pursuant to 15 U.S.C. 1692 (a)(2)(A) for each violation of the Act;
- c) For an award of costs of litigation and reasonable attorney fees pursuant to 15 U.S.C. 1692 k (a) (3); and
- d) For such other and further relief as may be just and proper.

Bill T. Walker

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